

IN THE  
United States District Court for the  
Eastern District of North Carolina

Southern Division

ANDREW U. D. STRAW,  
*Plaintiff,*

v.

UNITED STATES OF AMERICA,  
*Defendant.*

Case#: 7:23-cv-162-BO-BM

Hon. Terrence Boyle

Judge Presiding

Hon. Brian Meyers

Magistrate Judge

JURY TRIAL DEMANDED

FILED  
MAY 12 2023  
PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
DEP CLK

**FIRST AMENDED COMPLAINT**

COMES NOW, *pro se Plaintiff* ANDREW U. D. STRAW (hereinafter "Plaintiff"), individually, hereby state as follows as a Camp LeJeune toxic water victim adding a new count for law career damage from mental illness caused by the toxins:

**FACTS**

1. This Complaint alleges a federal cause of action and is brought solely pursuant to Section 804(b) of the "Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics (PACT) Act," also known as the "Camp LeJeune Justice Act of 2022" (hereinafter "the Act" or "CLJA"). Public Law 117-168, SEC. 804; 136 Stat. 1802-1804.
2. In order to facilitate an answer to this amended complaint given there has been an answer at **Dkt. 17** to the original **Dkt. 1** complaint, all allegations of the original complaint are incorporated here by reference.
3. Moreover, the government has admitted under Rule 36(a) by failing to respond to my RFA that I have bipolar disorder, *inter alia*, that was caused by Camp

LeJeune poisoning of me *in utero* and as an infant from 1968-1970 and that this bipolar affected my law career such that I was severely injured by the label and the discrimination of others.

4. My time aboard Camp LeJeune was admitted to be 583 days, over 19x the 30-day requirement in SEC. 804(b) of CLJA.
5. The only remaining issue is the amount of damages for this second claim.
6. Count I of the original complaint should be resolved through the RFA admissions, including the damages amount of \$51,000,000 for the infant brain injuries.
7. Given the government has entered its answer on April 30, 2023, I have 21 days to amend as a matter of right and do so now before that **May 21, 2023**, deadline. **FRCP Rule 15(a)(1)(B)**.
8. Given I am *pro se*, none of the proposed "leader" attorneys for other people may make decisions for me in my case, notwithstanding 7:23-cv-897, the "master docket." I have nonetheless requested to be on the Plaintiff Steering Committee in a separate mailing.

**COUNT II: LAW LICENSE AND CAREER DAMAGES FROM BIPOLAR CAUSED  
BY CAMP LEJEUNE POISONING**

9. My law career was devastated by having bipolar and having it used against me once it was forced out of me as a requirement on the Indiana bar exam application form in 2001. I was encumbered in my Indiana license in 2002 and later attacked by the Indiana Supreme Court ADA coordinator based on my

“mental disability” after I made complaints to her about her employer and client discriminating against me. See, **RFA and admissions**.

10. I have lost 5 law licenses over this to many years of suspension and my career is effectively over. Even my Virginia license was affected because after Indiana hurt me in this way, professional insurance companies would not cover me in Virginia despite my having never been sanctioned at all for 22 years as of 2021, and thus with no income from that license, I could not afford to pay the annual fees. I resigned my VSB law license due to the poverty Indiana inflicted on me because I have bipolar and Indiana bans all disabled people from practicing law. Ind. Adm & Disc. R. 23, Sections 2(c) & 3(b). The effects of Indiana’s rules and actions have spread nationwide, with other courts parroting that I was suspended for frivolous cases when that was not true at all. It was just Indiana’s way of attacking me when federal courts did not issue any sanctions in the first place. *Straw v. LinkedIn*, 5:22-cv-7718-EJD (N.D. Cal.) (Dkts. 22-5, 22-6, 22-20, 22-21, 22-22).

11. The only law career destruction issue not admitted from failure to respond to the April 1, 2023, RFA is the appropriate **level of damages**.

12. I claim \$55,000,000 in compensatory damages and I would appreciate if the government would simply admit this is the appropriate amount, and the same amount that I claimed in my second Navy JAG claim on 11/3/2022. **Dkt. 17, ¶ 128**. This covers all career damages, including property damage to my law licenses and career damages of all kinds.

13. My claim was deemed ripe and anticipated by the defendant in its answer at **Dkt. 17, ¶ 128.**

14. The other reliefs, including declaratory and injunction and any other appropriate reliefs from the original **Dkt. 1** are retained.

15. Jurisdiction and Venue are the same as the original complaint. **Dkt. 1. 28** U.S.C. § 1331 and CLJA for federal subject matter jurisdiction. CLJA, SEC. 804, mandates all cases be filed in this district, resolving venue.

16. Original Service is deemed waived or satisfied by the general appearances of defendant's counsel at **Dkts. 5 & 6 & 18** as well as the **Dkt. 17** defensive answer and the **Dkt. 16** defensive RESPONSE to my injunction and summary judgment motions.

17. The affirmative defenses from the **Dkt. 17** answer are dispensed with in the **LR56.1 Statement of Material Facts, ¶¶ 34-51**, supporting the Second Motion for Summary Judgment that I mailed to the Clerk of Court on **May 3, 2023.**

I, Andrew U. D. Straw, verify that the above factual contentions and statements are true and correct to the best of my knowledge, information, and belief, on penalty of perjury. Signed: **May 6, 2023.**

Respectfully,

A handwritten signature in black ink, reading "Andrew U. D. Straw", written over a horizontal line.

s/ ANDREW U. D. STRAW  
712 H ST NE, PMB 92403  
Washington, D.C. 20002  
Telephone: (847) 807-5237 andrew@andrewstraw.com

## CERTIFICATE OF SERVICE

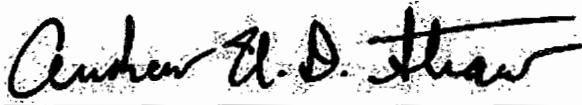
I, Andrew U. D. Straw, certify that on **May 6, 2023**, I sent this **FIRST AMENDED COMPLAINT**, noting that the evidence supporting Count II is the same set of admissions created by the **April 1, 2023, RFA**, to which the government did not respond, except as to **damages for Count II, still TBD**. I sent this amended complaint via U.S. Mail to the Clerk of Court on **May 6, 2023**. CM/ECF will serve all counsel when the Clerk scans this document and enters it into the PACER.gov system, including:

Elizabeth K. Platt, elizabeth.k.platt@usdoj.gov

Haroon Anwar, haroon.anwar@usdoj.gov

Allison Meredith O'Leary, allison.o'leary@usdoj.gov

Respectfully submitted,



s/ ANDREW U. D. STRAW

*Pro Se Plaintiff*

712 H ST NE, PMB 92403

Washington, D.C. 20002

Telephone: (847) 807-5237

andrew@andrewstraw.com